

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)

**RAS Crane LLC**

Attorneys for Secured Creditor  
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-and-

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Fairfield, NJ 07004

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Laura Egerman, Esq. (LE-8250)

In Re:

**FRANCISCUS MARIA DARTEE**  
**a/k/a FRANK M. DARTEE,**

**Debtor.**

Case No.: 18-26407-JKS

Chapter: 11

Hearing Date:

Judge: John K. Sherwood

**NOTICE OF MOTION FOR ORDER VACATING AUTOMATIC STAY OR**  
**CONFIRMING NO STAY IN EFFECT AND ALLOWING PROSPECTIVE RELIEF AS**  
**TO REAL PROPERTY PURSUANT TO 11 U.S.C. §362(c)(4)**

HEARING DATE AND TIME:

<HEARING DATE> at <TIME>

**ORAL ARGUMENT IS REQUESTED IN THE EVENT**  
**OPPOSITION IS TIMELY FILED**

TO:

**Pro Se Debtor**

Franciscus Maria Dartee  
12 Moonshadow Court  
Kinnelon, NJ 07405

**U.S. Trustee**

US Dept of Justice  
Office of the US Trustee  
One Newark Center Ste 2100  
Newark, NJ 07102

PLEASE TAKE NOTICE that on **November 6, 2018 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, RAS Crane, LLC, attorneys for THE BANK OF NEW YORK MELLON CORPORATION AS TRUSTEE FOR STRUCTURED ASSET MORTGAGE INVESTMENTS II INC. MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-AR7 (“Secured Creditor”), the within creditor, shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at 50 Walnut Street, Newark, NJ 07102, Courtroom 3B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, DISTRICT OF NEW JERSEY PO BOX 1352, NEWARK, NJ 07101-1352**, and simultaneously served on Secured Creditor's counsel, **RAS CRANE, LLC, 10700 ABBOTT'S BRIDGE ROAD, SUITE 170, DULUTH, GEORGIA 30097 and 130 CLINTON ROAD, SUITE 202, FAIRFIELD, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: October 15, 2018

**RAS Crane LLC**

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By: /s/ Laura Egerman  
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